

# Wyoming Department of Agriculture

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*The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life*



Wyoming Department of Agriculture

April 24, 2009

Bighorn National Forest  
Attn: Laurie Walters-Clark, Team Leader  
2013 Eastside 2<sup>nd</sup> Street  
Sheridan, WY 82801

Dear Ms. Walters-Clark:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Scoping Notice to prepare an Environmental Impact Statement (EIS) to continue commercial livestock grazing on 43 livestock grazing allotments and implement fuel management activities in 2 areas within the Bighorn National Forest (BNF).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposed project affects our agriculture industry, our natural resources, and the welfare of our citizens, it's important we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

We strongly encourage BNF staff to work closely with all affected grazing permittees. Agriculture producers are intimately familiar with areas affected by this proposal and they possess irreplaceable long-term, on-the-ground knowledge. They are particularly aware of the individual and cumulative impacts upon wildlife and livestock, as well as rangeland health for the planning area. We highly recommend that BNF officials seek and address the concerns and recommendations of these producers. Moreover, it is imperative that BNF officials continuously inform all livestock grazing permittees who are directly or indirectly affected by this proposed EIS of the issues, decisions, and resulting actions regarding the proposal.

Management prescriptions in the EIS must reflect multiple use resource principles. Congressional mandates, federal statutes, and implementing regulations call for multiple uses on Forest Service-administered lands. WDA particularly believes that the Congressional policy expressed in the Federal Land Policy and Management Act of 1976 (FLPMA) about livestock grazing needs to be specifically noted. FLPMA Sec. 102(8) states "The Congress declares that it is the policy of the United States that...the public lands be managed in a manner...that will provide food and habitat for fish and wildlife and domestic animals..." Many in the public are unaware of this Congressional policy. The policy is critical to livestock grazing operations and should be expressed in this assessment. In addition, livestock grazing is identified as an appropriate use in the Bighorn National Forest Plan (2005).

Grazing on public lands represents a vital economic value to agricultural producers and to local communities. Impacts on this economic activity need to be included in the EIS. In addition to its economic impacts, livestock grazing represents irreplaceable environmental and social values. These values contribute valuable and irreplaceable wildlife habitat, open spaces, ranchland buffers between federal lands and developments, scenic vistas, and the traditional image and heritage of the historic rural

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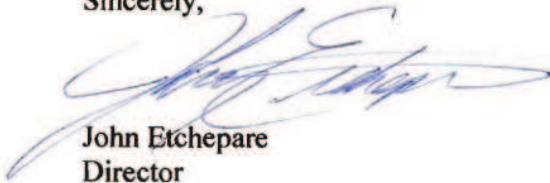
landscapes of Wyoming. Losses of these essential environmental, historic, and social values of livestock grazing to users and visitors of the area and residents of impacted communities should be included in the scope of the EIS.

We support efforts to restore the vegetative and age-class diversity of a fire-adapted ecosystem to forest and sagebrush communities in Wyoming. Thinning dense tree and shrub stands will also open up the canopy to allow herbaceous vegetative growth, thus allowing livestock grazing to continue and improve on the allotment. These management actions will increase Animal Unit Months (AUMs) and in turn supplement local economies. We request that the duration of time needed before grazing can again occur on treated areas be evaluated on a case-by-case basis in cooperation with the grazing permittees, rather than adhering to a predetermined nationwide policy. Managed livestock grazing is encouraged at the first feasible opportunity.

Decisions in the proposed plan should allow BNF officials, grazing permittees and private landowners the opportunity to work cooperatively. This EIS should allow flexibility to make the best site-specific decisions on a case-by-case basis, while keeping the best interests of the affected resources and citizens in mind.

In conclusion, we support the continuance of commercial livestock grazing on the 43 grazing allotments and the proposed fuel management activities. We appreciate the opportunity to comment on the scope of the proposed EIS. The WDA requests that the BNF consider previous scoping comments made for the Goose Creek area. If any changes to grazing management practices or AUMs are expected please contact WDA. We look forward to hearing about and being involved in proposed actions and decisions and appreciate the opportunity to comment.

Sincerely,



John Etchepare  
Director

JE/jc

CC: Governor's Planning Office  
Farm Bureau  
Guardians of the Range  
Rocky Mountain Farmer's Union  
Wyoming Board of Agriculture  
Wyoming Game and Fish Department  
Wyoming State Grazing Board  
Wyoming Stockgrowers